

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE COMMISSION
ON ITS OWN MOTION, TO RE-EXAMINE
ITS RETAIL QUALITY OF SERVICE
STANDARDS FOR ALL LOCAL
EXCHANGE CARRIERS OPERATING
WITHIN THE STATE OF NEBRASKA.

Application No. C-2483/PI-43

QWEST'S SUPPLEMENTAL COMMENTS

In response to the Nebraska Public Service Commission's ("Commission") initial order opening this docket, Qwest filed comments regarding the retail service quality standards for all local exchange carriers operating within the state of Nebraska. In response to the Commission's October 1, 2002, Progression Order No. 3 entered in the above captioned matter, Qwest submits the following supplemental comments.

**Nebraska Administrative Code
Chapter 5 – Telecommunications Rules and Regulations**

002.17 Customer Billing:

002.17A Bills to customers shall be rendered regularly and shall contain a clear listing of all charges. A written itemized listing of the services being subscribed to and their monthly rates shall be provided as a part of the initial bill or when service is ordered and subsequently upon reasonable request of the customer.

Response: The current rule requires a "written itemized listing of the services being subscribed to...". Qwest wants to revise its comments filed on March 6, 2001 to extend the interpretation of the rule to include "written" to be as in regular mail or as in internet access to the customer's bill. There are numerous reasons that customers may prefer the electronic version as their choice due to security or privacy issues. Qwest wants to ensure that the customer's preference for an electronic version meets the intent of the rule. The ability to get full detail also exists on the online version of the bill.

02.11 Answering Time Objectives:

Each exchange carrier shall provide equipment designed and engineered on the basis of realistic forecasts of growth, and shall make all reasonable efforts to provide personnel so as to attain the following daily operator answer performance objectives under normal operating conditions:

002.11B2 Ninety percent (90%) of repair service calls, calls to the business office and other calls shall be answered within twenty (20) seconds (equivalent measurements as approved by the Commission may be used).

Response: Qwest recommends moving to a standard in which calls to Qwest's business offices and repair centers will be on hold no more than 60 seconds on the average before being answered by a live service representative. Qwest uses a Voice Response Unit (VRU), an automated response system, to provide customers with the most effective and efficient way to reach a service representative who can assist them.

The VRU is designed to help customers reach the correct department on the first call. Due to the variety of needs a customer may have, and consequently, the number of different options they may select in the VRU, it is difficult to measure the specific time spent by a particular customer to reach a representative. The system currently captures the average time it takes to answer once the customer has made their selection. A measure of average wait time will better serve all customers rather than just a percentage of the customers.

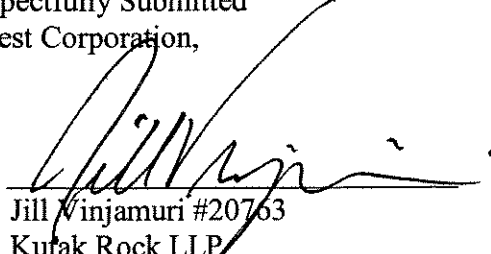
Qwest believes the way to measure good customer service is from the customer's viewpoint. Customers think in terms of how long it will take for their call to be answered or how long they will be on hold. If a customer is forced to wait 30 minutes on hold before a customer representative is able to help them, then they are going to be dissatisfied. It won't make the customer feel better to know that 90% of customers' calls were answered in 20 seconds. Measures that capture the percentages of calls answered in a given period are useful but do not represent the true customer experience.

Qwest strongly believes moving to a minimum average wait time of a maximum of 60 seconds balances both customer expectations and the interest of measuring the experience of all customers, rather than just a percentage of customers.

Dated this 7 day of November, 2002.

Respectfully Submitted
Qwest Corporation,

By


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